



## **KARPF, KARPF & CERUTTI, P.C.**

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January 13, 2025

### **SENT VIA ECF**

Magistrate Judge José R. Almonte  
United States District Court  
Martin Luther King Building  
& U.S. Courthouse  
50 Walnut Street Room 4015  
Newark, NJ 07101

**Re: George Mandarakas v. The University of Notre Dame du Lac, et al.**  
**No. 2:23-cv-02539**

Dear Judge Almonte,

I represent the Plaintiff in the above-referenced matter. Kindly accept this letter application in lieu of a more formal motion. For purposes of this letter, I again presume familiarity with the case and the issues in the interest of brevity.

The Court previously granted an extension of its jurisdiction and directed the parties to file a joint status report on or before today. To that end, I had a substantive discussion with Ms. Tolomeo on January 9, 2025 via telephone. Ms. Tolomeo indicated she would need to speak with her client before we could make a joint proposal / status report.

However, I received a call from Ms. Tolomeo's law partner (Peter J. Smith, Esq.) late afternoon on Friday January 10, 2025. Mr. Smith is not entered on this case but represents the Defendant in other matters as I understand it. Mr. Smith indicated Ms. Tolomeo would be out of the office for a while. It was unclear to me whether this absence is for professional, personal or medical reasons. I told Mr. Smith of today's deadline during the call and he indicated he was going to attempt to get in touch with Ms. Tolomeo. I have not heard back yet from Mr. Smith as of this filing.

For these reasons, I respectfully ask 1.) for the Court to extend its jurisdiction until January 21, 2025 (insofar as January 20, 2025 is a federal holiday) and 2.) for an extension of time to jointly report back on the status of this matter. I hopeful I will be able to connect with either Ms. Tolomeo or her partner this week.

Your Honor's time and consideration in this regard is greatly appreciated. If Your Honor has any questions or concerns, please do not hesitate to have your staff contact my office.

Respectfully submitted,

KARPF, KARPf & CERUTTI, P.C.

/s/ W. Charles Sipio  
W. Charles Sipio

WCS/

cc: All Counsel of Record via ECF Only